

National Organic Standards Board  
c/o Arthur Neil  
Room 4008-South Building  
1400 Independence Avenue-SW  
Washington, DC 20250-0001

RE: Support of the NOSB's draft pasture guidance document

As a consumer and significant other of a small organic farmer in New England, I was *APPALLED* to learn of the CAFO's (concentrated animal feeding operations). I had always thought that "Organic" meant just what it was being portrayed to mean, "100% NATURAL".

I see the word **CONCENTRATION**, and it brings shivers up and down my spine.. Concentration brings to mind the concentration camps during WWII. *Did humans thrive in concentration camps?* I hope that this is not what **ORGANIC** is all about. (Confinement of animals).

We are working for the consumer (myself included) insuring that the products that we are selling and purchasing are in fact **100%ORGANIC**\*, not mass produced with more likelihood of disease. The practice of CAFO's in my mind is NOT! As their cattle are not allowed the fresh air, sunlight, fresh pasture feed to graze in (when they want it), or exercise, that makes, in my mind, a healthy product, and in fact is outlined in NOFA of VT Certification Guidelines.

Why would a consumer purchase a product at a higher expense, if they can purchase the same item for a lower price, that is in fact the same product. After researching CAFO's products, I would qualify them as , **CONVENTIONAL**, just being sold under the label **100% ORGANIC**.

As a Vermonter, I become more sedentary in the winter months, due to the inclement weather (snow/cold). When spring arrives, I shed my winter apparel and seek the warmth and sunlight of the outdoors. I once again become more active, shedding excess poundage, and inhaling the fresh air that Vermont is well known for. Our animals need to be allowed (weather permitting) ample access to pasture land for these very same reasons.

A bale of hay or silage to me brings the idea of fast food to my head. Yes, they need it in the months that they are not allowed to graze due to weather conditions, but as in the farm that I work on, I know first hand that a cow becomes over weight during the winter months. In the spring when weather permits our cattle are let out to pasture to graze. It is enjoyable to watch them jump, run and carry on like small children, the first few days that they are let out. They do drop in milk production early on, but spring back in a matter of weeks. This drop in milk production, I believe is one factor that the CAFO does not want to endure (pocketbook) wise. They want a steady amount of milk being produced on a daily bases (*day in and day out*), whether it is good for the animal or not! Whether it is construed as "**ORGANIC**" or not! The bottom line is **MONEY**, that is all that they are looking at. I see no benefit to the organic community or farmer in CAFO's other than for *sheer profit*

We need to band together to assure the consumer that. Organic is **100% NATURAL** as I have stated more than once. Yes, we make a profit on our farm, as most business people strive to do, but not at the expense of the consumer, or the health of our cattle.. Our product is produced by healthy, well maintained farm

rules and regulations set-up by NOFA of VT(as outlined below), and we adhere to all rules and regulations as much as humanly possible.

Page 37 **B. Housing & Husbandry (205.239)**

Organic livestock farms must ensure the quality of life for livestock and encourage full expression of the nature of each class of livestock by means of housing and husbandry.

- Herd animals be allowed to freely associate in the light and air with enough space and time to manifest normal behavior.
- Ruminants have daily access to grazable forage throughout the grazing season. The VOF Review Committee has determined that cows over 6 months of age should be out on pasture.
- Housing provide for adequate ventilation, adequate supply of clean water, proper sanitation, and daily outdoor access during the non-grazing season unless temporarily restricted by severe weather, individual health conditions, stage of production, or concern for the protection of plant, soil or water quality. The VOF Review Committee has determined that cows should have outdoor access year round. Poultry should have outdoor access once they are sufficiently feathered (around 4 weeks), but may be confined during inclement weather

If it takes the USDA to mandate the rules and regulations set up by NOFA of VT than I support the following: the USDA needs to require that cattle are to be grazed for a period of not less than 120 days and that they are provided grazed feed greater than 30% dry matter intake on a daily basis during the growing season.

Hopefully this will require **ALL** organic farmers to comply, not just NOFA of VT farmers.

If this means that there is a shortage of organic milk than **SO BE IT!**

At least all **100% Organic** product that is on the shelves, will be as stated **100% Organic**, throughout the USA.

I hope that these few CAFO's will not be allowed to continue as they are, JEOPARDIZING the integrity, reputation, and trust that the consumer needs to feel when purchasing 100 %ORGANIC!

COFA's have blatantly broken a **HUGE** part of the contract by not grazing their cattle. Please do not let this continue. Until this is mandated, I urge you to **STOP** allowing this practice to continue **NOW!** (**BEFORE WE HAVE LOST THE TRUST OF THE CONSUMER**). This would be detrimental to the world, as organic has started an alternative to the pesticide, medicinal, way of farming.. COFA's have introduced another detrimental practice (*confinement of animals*). All products on their farms should be banned from the Organic milk supply **IMMEDIATELY**.

Organic is a step, in my eyes, that is (**for our world and generations to come**) the way to go.

Our farm is closely monitored to insure that we comply with all organic certified requirements, so I do not understand **WHY** this practice has been allowed!. If we did not comply with this, I would fully expect to not be part of the Organic organization and would expect that our milk would not be shipped on the

ORGANIC market, but would be shipped to a CONVENTIONAL milk handler.

It seems simple enough to me. This is not a gray area. It is black and white in my eyes! Either comply to the rules and regulations, or **GET OUT** of the Organic production business.. You can't have it both ways. It is **ALL** or nothing.

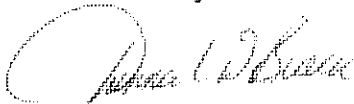
I feel extremely blessed to be able to contribute to a healthier environment, and all around better nutritional product, due to going back to NATURE.

The labels placed on ORGANIC raised cattle need to be just that:

**100% ORGANIC!**

I would like to thank you for taking the time to read the afore document, and hope this is matter is taken as seriously as I have. If we lose their trust in our product, then the whole concept of **ORGANIC** will be lost. Please do not let this occur. I urge you to **ACT** now! Before it is too late. Not only for the integrity of the little farmer, but for the benefit of our world as a whole.

Sincerely,



Donna L. D. Brown  
PO Box 38  
West Danville, VT 05873

I am an ☒ organic dairy farmer ☒ **STEWART**  
☒ organic consumer **OTHEL**